

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

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IN RE TERRORIST ATTACKS ON

Civil Action No.

SEPTEMBER 11, 2001

03 MDL 1570 (GBD)

-----X

FIONA HAVLISH, in her own right :  
and as Executrix of the ESTATE OF :  
DONALD G. HAVLISH, JR., Deceased, et al., :

Plaintiffs, :

v. :

USAMA BIN LADEN, :

AL-QAEDA/ISLAMIC ARMY, :  
an unincorporated association, *et al.* :

FOREIGN STATE DEFENDANTS, :

THE ISLAMIC REPUBLIC OF IRAN, :  
ALI AKBAR HASHEMI RAFSANJANI :  
Previously Identified and Served as :  
Unidentified Terrorist 1, :

IRANIAN MINISTRY OF :  
INFORMATION AND SECURITY, :

THE ISLAMIC REVOLUTIONARY :  
GUARD CORPS, :

HIZBALLAH, :  
an unincorporated association, :

THE IRANIAN MINISTRY :  
OF PETROLEUM, :

THE NATIONAL IRANIAN :  
TANKER CORPORATION :  
Previously identified as Unidentified Terrorist 2, :  
:

:  
: CIVIL ACTION NO. 03-CV-9848 - RCC  
: Case Transferred from the United States  
: District Court for the District of Columbia  
: Case Number 1:02CV00305  
:

**AFFIDAVIT**  
**OF**  
**DR. RONEN BERGMAN**

THE NATIONAL IRANIAN :  
OIL CORPORATION, :  
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THE NATIONAL IRANIAN :  
GAS COMPANY :  
Previously Identified as Unidentified Terrorist 4,:  
 :  
IRAN AIRLINES :  
Previously Identified as Unidentified Terrorist 5,:  
 :  
THE NATIONAL IRANIAN :  
PETROCHEMICAL COMPANY :  
Previously Identified as Unidentified Terrorist 6,:  
 :  
IRANIAN MINISTRY OF :  
ECONOMIC AFFAIRS AND FINANCE :  
IRANIAN MINISTRY OF :  
COMMERCE, :  
 :  
IRANIAN MINISTRY OF DEFENSE :  
AND ARMED FORCES LOGISTICS, :  
 :  
THE CENTRAL BANK OF THE :  
ISLAMIC REPUBLIC OF IRAN, *et al.* :  
Previously Identified as Unidentified Terrorist 7,:  
 :  
Defendants. :

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**Affidavit of Dr. Ronen Bergman**

I, **Dr. Ronen Bergman**, being duly sworn, do hereby swear and affirm under penalty of perjury that the contents of this **Affidavit** are true and correct to the best of my knowledge, information, and belief. Similarly, I have read the allegations contained in the **Havlish Third Amended Complaint**, and I believe they are true and correct to the best of my knowledge, information, and belief.

1. My name is Ronen Bergman. I am an adult citizen of the State of Israel and reside in Tel Aviv. I also have Polish citizenship.
2. I received an LLB from Haifa University in 1997, graduating *cum laude*. I have been a member of the Israeli Bar Association since 1998.
3. I hold two other advanced degrees: an MPhil. in International Relations and a PhD in History, both from Cambridge University, England.
4. Between 1990 and 1993, I served in the Israel Defense Forces ("IDF") in the intelligence unit of the Criminal Investigation Department ("CID"), and I continue serving as a reservist in the unit to this day.
5. I am a senior political and military analyst for *Yedioth Ahronoth*, Israel's largest circulation daily newspaper.
6. Over the past 16 years, I have developed close professional contacts with senior military and intelligence officials in Israel, as well as with senior intelligence officials in the United States, the United Kingdom, Germany, France, Egypt, Argentina, Canada, and Bosnia.
7. In my capacity as an expert on international intelligence, especially the Mossad and terrorism, I have, over the past 16 years, conducted extensive interviews, some spanning the course of several days, with many former Iranian intelligence and military personnel, both high-ranking individuals and field operatives, as well as with former political figures and political opponents of the Iranian regime.

8. I am one of the very few journalists to have been invited to embed in elite Israeli military units on commando, intelligence-gathering and anti-terror operations. I have also covered directly the military conflict between Israel and Hezbollah in Lebanon in 2006 and Operation "Cast Lead" in Gaza in 2008.
9. I am generally considered one of the principal experts on the Israeli intelligence community's assessment of Iran in general, and Iran's nuclear program and the Iranian support of foreign terrorist organizations in particular, both of which are issues that the Israeli intelligence services have in the past decade devoted more time and energy to than any other issue.
10. I make this affidavit on the basis of intensive research, including review of thousands of documents, including intelligence material gathered by Israel, the United States, France, the United Kingdom, Egypt, Jordan and Germany, as well as interviews I conducted with hundreds of people, including top officials in the intelligence and military services of Israel and some of the other countries cited above. This affidavit thus results from my detailed study of the subject matter of world terrorism, which has been my life's work for the past 17 years. Many of the assertions in this affidavit are contained in a book I authored, published originally in Israel under the title *Nekudat Ha-al Khazor* (Point of No Return) in 2007 and an updated version in the United States by the Simon & Schuster \ Free Press in September 2008 under the title *The Secret War with Iran*. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
11. I have written and published (in Hebrew) four books on military- and intelligence-related issues. All four books have received extremely favorable reviews, and all have topped the non-fiction best-seller lists in Israel.
  12. I have published dozens of articles dealing with the subject of terrorism as well as military, intelligence, espionage, international affairs, law, and history. In addition to the Israeli print journalism media, my articles have been published in *The New York Times*, the *Wall Street Journal* and in the journal *Foreign Affairs*, as well as in *The Times* and the *Guardian* in England, the *Frankfurter Allgemeine Zeitung* and the *Sueddeutsche Zeitung* in Germany, and the *Neue Zueriche Zeitung* in Switzerland. I have been interviewed regarding my work by several newspapers in the U.S. and Europe.
  13. I have lectured widely on issues pertaining to international terrorism at universities, including Princeton, Yale, Columbia, NYU, Oxford, and Cambridge, at military and intelligence academies, including West Point Military Academy, and many others forums.
  14. I appear regularly on Israeli television as co-anchor of a prestigious news and current affairs magazine show (broadcast by the Israeli equivalent of PBS), and have appeared on news programming on television and radio in the U.S. and the U.K. I have also made numerous appearances on Al-Jazeera.

15. For additional expert qualifications, including details on the qualifications mentioned above, please see Exhibit A, attached hereto.

**Affidavit Summary**

16. Based on all of the above-mentioned sources and my analysis of all the materials I have seen and all the interviews I have conducted, **it is my expert opinion that the Islamic Republic of Iran was, and is, a benefactor of, and provided material aid, resources, and support to Osama bin Laden and al Qaeda, both before and after the attacks of September 11, 2001, on the United States.** Further, it is my expert opinion that the Islamic Republic of Iran stands at the center of the rise of modern terrorism, and that Iran consistently supports terrorist operations against a number of targets throughout the world, including the United States. The bases for my opinion are explained in this Affidavit.
17. These opinions are consistent with the conclusion in the 9/11 COMMISSION REPORT, at pages 240-241, that Iran facilitated the travel of hijackers between Iran, Saudi Arabia, and Afghanistan within a year before the attacks. This facilitation enabled the acquisition of important travel documents, passports, and visa and therefore, entry into the United States. Additionally, my opinions are consistent with the observations, in the 9/11 COMMISSION REPORT and elsewhere, that Iran provided a safe harbor to members of the al Qaeda leadership shortly after the 9/11 attacks.

**Affidavit Contents**

18. Iran has been on the U.S. State Department's list of foreign state sponsors of terror ever since January 19, 1984. According to the State Department, Iran was involved in 133 terrorist operations in the nine years between 1987 and 1995 alone; many other acts of terrorism involving hundreds of fatalities preceded and followed this eight-year period.
19. In its long history of terrorist violence, Iran has frequently utilized a wide range of proxy organizations and partners to carry out its terrorist missions, including, among others, al Qaeda, Hizballah, and Hamas.
20. Iran founded the terrorist organization known as Hizballah (meaning Party of God) after Israel's 1982 invasion of Lebanon brought about the departure from that country of another terrorist organization, the Palestine Liberation Organization ("PLO"). Iran created the new terrorist organization specifically for the purpose of Hizballah acting as Iran's terrorist and political proxy in Lebanon. Iran was hoping to recreate the success of Khomeini's revolution in Lebanon, with the support of the local Shiite community.
21. Iran has also worked closely with other terrorist proxy organizations, including al Qaeda, Palestinian Islamic Jihad, al Jamaa al Islamiyya, the Abu Nidal Organization, Hamas, and many others operating in the Middle East, Sudan, Afghanistan, Iraq, Pakistan, Bosnia, and other places.
22. Hizballah has been designated by the U.S. State Department as a "foreign terrorist organization," or FTO.

23. Although there are now Hizballah organizations in several other Middle Eastern countries, its main operations have been in Lebanon, where it serves as a *de facto* government in much of that country.
24. Hizballah has waged a campaign of terrorism and war against Israel for almost three decades.
25. Hizballah was an Iranian organization from its inception. It was created and managed by Iran's Islamic Revolutionary Guards Corps ("IRGC") and Iran's Ministry of Intelligence and Security ("MOIS" or "VEVAK"). In fact, in the beginning, Hizballah did not even have its own leader in Lebanon (although it does now); its official leader originally was Iranian Supreme Leader Ayatollah Khomeini. It was run by a Shura Council, on which Khomeini had his own Iranian representative, Hojat al Islam Ali Akbar Mohtashemi-Pour.
26. One of Khomeini's closest associates, Mohtashemi-Pour was also appointed Iran's ambassador to Syria in 1982 and, later, Iran's ambassador to Sudan. While in Syria, Mohtashemi-Pour controlled Hizballah's budget, the money for which came from Iran – millions of dollars every month at the rate of 100 million annually.
27. Since the 1980's, Iran has funneled money and weapons to Hizballah.
28. Iran helped Hizballah seize a training camp in the Baalbek area of Lebanon from the Lebanese army. That camp, formerly called the Sheikh Abdullah Camp, is now known as Camp Imam Ali. It became the headquarters of the Hizballah militia and the IRGC in Lebanon. In the ensuing years, the IRGC trained Hizballah recruits at this camp in all



spheres of combat, sabotage, and terrorism, including bomb-making and suicide missions.

29. The military leader of Hizballah was, until his death by assassination in Damascus, Syria, in February 2008, **Imad Fayez Mughniyah**. He was on the FBI's Most Wanted List for twenty-one years.
30. Mughniyah, a Shi'ite Muslim, was born in southern Lebanon in 1962, and grew up in the slums of south Beirut. After serving in the late 1970's as a bodyguard in Yasser Arafat's Fatah movement, where he underwent guerilla training, he joined al Dawa, a small extremist Shi'ite organization that later was drawn into Hizballah.
31. By the early 1980's, Mughniyah became affiliated with the Islamic regime in Iran. He lived in Iran for many years.
32. The authorities in the Israeli and American intelligence services believe that Imad Mughniyah conceived, designed, planned, commanded, and/or carried out terrorist operations involving hundreds of deaths, more than any other single figure in the world.
33. In March 1983, at a meeting in Mohtashemi-Pour's office in Damascus, Syria, attended by leaders of Hizballah, including Imad Mughniyah, as well as Syrian intelligence agents, Mohtashemi-Pour and the other leaders decided upon a series of attacks against American targets with the goal of driving the U.S. out of Lebanon. Syrian intelligence was to provide information about the security protection of the targets, and Imad Mughniyah was to carry out the attacks.

34. The first of these attacks occurred just two weeks later. Mughniyah and his cadres attacked a U.S. Marines patrol. Two Americans were killed.
35. Mughniyah then planned and directed the suicide truck bombing of the United States Embassy in Beirut on April 18, 1983, killing 63 Americans, including most of the CIA staff on location and the CIA's Near East Bureau chief, Robert Ames.
36. After that, Mughniyah directed the devastating suicide truck bombings of the U.S. Marines' and French paratroopers' barracks at the Beirut airport on October 23, 1983. The nearly simultaneous blasts killed 241 Marines and 58 French paratroopers. Many more were injured. Imad Mughniyah himself, according to several intelligence sources, watched the suicide truck bombings from a nearby rooftop.
37. Before the attacks on the American and French barracks, the U.S. National Security Agency intercepted cabled messages from the Iranian Foreign Ministry to the Iranian Embassy in Damascus, Syria, in which the Iranian government requested that a large-scale attack be mounted against the Americans. The NSA also intercepted telephone calls from Iran's Revolutionary Guards in Baalbek, Lebanon, requesting from the Iranian Embassy in Damascus a green light for the attacks.
38. The attacks led to the withdrawal of the allied military Multi-National Force from Lebanon. Together with the evacuation of the Palestine Liberation Organization (PLO) from Lebanon caused by the Israeli military's invasion in 1982, the U.S.-led forces' withdrawal enabled Hizballah to become the dominant military and political force in

Lebanon, which it remains today. **Imad Mughniyah became the leading figure in Hizballah's military/terrorism arm, known as Islamic Jihad.**

39. Following this, Mughniyah and his top lieutenants created a secret body within Hizballah, the "Special Research Apparatus," which was behind many of Hizballah's most successful operations in the early 1990's. The Special Research Apparatus was comprised of two to four hundred crack special forces, all trained in Iran.
40. An internal "top-secret" Israeli Military Intelligence document, to which I have had access, states that "Iran is aided by Hizballah's operational infrastructure abroad, which is based mainly on Shi'ite expatriates through the Islamic Jihad apparatus of Imad Mughniyah, for the purpose of attacks. It is to be noted that recently links have been tightened between Iranian intelligence and Mughniyah's apparatus, which helps Iran locate candidates from Islamic and Palestinian organizations for training in Iran or Lebanon. It appears that Imad Mughniyah has a role in the organization of this training."
41. According to a highly classified 1996 assessment paper by Israeli Military Intelligence, to which I have had access, "Iran uses terror against Israel rarely and rationally, out of an awareness of the grave diplomatic damage which it could cause itself if its role were to be exposed. Accordingly, Iran usually refrains from carrying out attacks directly, and its involvement usually follows an indirect course." **That "indirect course" went through Imad Mughniyah.**
42. In March 1992, Iran and Hizballah bombed the Israeli embassy in Buenos Aires, Argentina killing 29 and injuring over 250. Israeli, American, and Argentinean

intelligence services all concluded that the attack was carried out by proxies of Hizballah and Iran, operating out of a lawless town called Ciudad del Este on the frontier bordering Paraguay and Brazil and acting under the direction of Imad Mughniyah. Three days before the bombing, the U.S. NSA had intercepted a message from the Iranian Embassy in Moscow to Tehran indicating clear awareness of an impending attack on an Israeli legation in South America. Two messages from the Iranian embassies in Buenos Aires and Brasilia to the Foreign Ministry in Iran were intercepted and decoded to indicate Iranian involvement in the attack. Finally, the U.S. NSA supplied Israel with unequivocal proof – “not a smoking gun, but a blazing cannon,” according to my Israeli intelligence source, that Imad Mughniyah and another senior Hizballah member, Talal Hamiaa, were responsible for the execution of the terrorist attack: they had been tape-recorded in a telephone conversation discussing the operation.

43. A year and a half later, a second attack came, a bombing of the seven-story headquarters of the Argentinean Jewish community organization (the Asociacion Mutual Israelita Argentina, or “AMIA”) in Buenos Aires, killing 86 people and injuring 252. **Again, the U.S., Israel, and Argentina all concluded that Iran, Hizballah, and Imad Mughniyah were responsible for the AMIA bombing.** The Argentineans issued arrest warrants against four senior Iranian officials as well as the Iranian ambassador to Argentina, Hade Soleimanpour, and the cultural attaché, Muhsen Rabani. Soleimanpour later filled several senior posts in the Iranian Foreign Ministry and, according to the CIA, he is actually a top official of Iran’s Intelligence Ministry. A second Argentinean investigation attributed responsibility for the AMIA bombing squarely on Iran, with **Interpol “red**

**notices” issued for Imad Mughniyah** and seven others senior officials of Iran and Hizballah. Iran's current defense minister, Ahmed Vahidi, is still wanted for this horrifying attack.

44. Further, the Jordanian government detained and interrogated (yet ultimately released, for other reasons) one of Mughniyah’s top Hizballah terrorist operatives, known as Abu al Foul, who confessed to the Jordanians that he and his terror cell had played the central role in both of these bombings in Argentina.

45. On June 25, 1996, the U.S. military’s complex at Khobar Towers, Saudi Arabia, was bombed, killing 19 Americans and injuring some 500 persons. The specific building that was bombed housed the U.S. Air Force’s 4404<sup>th</sup> Wing, which was tasked with supervising the no-fly zone in Iraq. Five months prior to the attack, the Saudis had caught a Lebanese truck, which was sent by Hizballah, loaded with explosives on its way to Khobar. Further, the interrogations of several Hizballah members arrested in Canada in March 1997 provided evidence that the attack was carried out by a Hizballah cell from Bahrain, acting on instructions from Iran. **Imad Mughniyah’s terrorist operatives were involved in the Khobar Towers attack**, aided by local supporters.

46. One of the existing myths about modern Islamist terrorism is that Sunni and Shi’a do not get along. Among common Muslims, there is a certain amount of historical, religious, and cultural discord, and even hatred, between these two sects. Yet this fact, perpetuated by governments and religious figures, itself serves as a convenient deception for terrorists and their state sponsors, especially Iran, because many Western analysts still assume the

historical Sunni-Shi'a rift somehow precludes their cooperation. Yet, when it comes to common enemies or objectives or using force to replicate the Iranian revolution in other localities, Sunnis and Shi'ites work together quite frequently.

47. The spiritual leader of the Sunni country of Sudan, Dr. Hassan al Turabi, was a key figure in making possible this Sunni-Shi'a cooperation in matters of terrorism. Western-educated, fluent in English and French, and well-acquainted with Western culture, Dr. al Turabi is a religious sage who advocated the creation of a common foundation for the Sunna and Shi'a. Iran embraced al Turabi and his teachings, inviting him to speak at its international conference in support of Palestinians in October 1991.
48. Afterward, Sudan quickly became a satellite of the Islamic Republic of Iran and a distribution center for Iranian weapons to be transferred to extremist Islamic organizations. Iran did not even try to camouflage its weapons shipments to Port Sudan.
49. Hundreds of IRGC members took up residence in Khartoum, Sudan, as did members of the Abu Nidal Organization, Hamas, Palestinian Islamic Jihad, Algerian FIS, Tunisian al Nahda, and, **notably, al Qaeda and its leader, Osama bin Laden.**
50. Egyptian extremists also flocked to Sudan, including some affiliated with the Muslim Brotherhood, whose members assassinated Egypt's President Anwar Sadat. Prominent among these was Dr. Ayman al Zawahiri, now the number two official of al Qaeda, who had previously served a prison sentence in Egypt for his complicity in the Sadat assassination.

51. In 1991, al Zawahiri paid a clandestine visit to Tehran to ask the Iranians to help him overthrow the government of Egypt. There, he met **Imad Mughniyah** and became convinced of the power of suicide bombing, a significant event because suicide was prohibited by most Islamic clerics, Sunni and Shiite. ‘

52. Dr. al Zawahiri ordered his first suicide attack in August 1993, against the Egyptian minister of the interior.

53. **The Iranians agreed to finance al Zawahiri and to train his men at IRGC camps in Iran and Sudan, and at Hizballah camps in Lebanon where al Zawahiri’s men trained under Imad Mughniyah.** In Sudan, at first, these fanatics trained at Sudanese army bases, but in the 1990’s more than a dozen special terrorist training camps were set up for them.

54. **Iran’s role in the emergence of al Qaeda is clear,** but little known, as media reports usually focus only on al Qaeda’s Sunni connections. In fact, while in the Sudan, Ayman al Zawahiri forged close links with various other elements who had found refuge there, and through him, ties were established between the veterans of the Afghani-Soviet war and Iran. Their common interests brought about an alliance of convenience under the aegis of al Turabi’s Sudanese regime. The group in Sudan kept in close touch with Afghanistan veterans all over the world and set up global links and networks for terrorist training, fund raising, and infrastructure.

55. Within this group of mujahedeen veterans, one man stood out: a Saudi construction contractor who had been expelled from his country and became a well-connected “mover

and shaker” in both Afghanistan and Sudan, while at the same time keeping up his building and trading business to double as a cover for his clandestine activities. His name was **Osama bin Laden**. The name of one of his construction companies was al Qaeda.

56. In Sudan, Osama bin Laden published a declaration to his followers stating that the two rival factions in Islam – Sunni and Shi’a – must unite against their sole common enemy – the West.

57. In Sudan, Osama bin Laden became closely allied with al Zawahiri, and Dr. al Zawahiri became not only bin Laden’s close friend but also his personal physician.

58. Ayman al Zawahiri made efforts to get Osama bin Laden to establish links with Iran, and bin Laden responded favorably. Osama bin Laden sent some of his senior aides to Iran for training with the IRGC and to Lebanon for training with Hizballah. **Imad Mughniyah came to Khartoum for a meeting with bin Laden in 1993.** There, Mughniyah told bin Laden about the enormously effective tactic of suicide attacks and their role in driving the Americans and the French out of Lebanon in the early 1980’s.

59. From this point on, **Mughniyah became a major connection point between Iran and al Qaeda.** This is known because of the testimony of the Egyptian-born naturalized American and former Green Beret sergeant, Ali Mohammed, who was convicted of involvement in the bombings of the U.S. embassies in Kenya and Tanzania.

60. Ali Mohammed confessed that, for a long time, he had tried to penetrate an American intelligence agency on behalf of bin Laden. He had moved to the United States, obtained U.S. citizenship, and joined the U.S. Army and was stationed at Fort Bragg, North



Carolina, where he trained Army Special Forces and was considered an expert on the Middle East. In 1989, he traveled to Afghanistan and joined the Islamic Jihad and bin Laden. He began training al Qaeda terrorists, drawing on his U.S. Army experience, particularly in the use of explosives and in intelligence-gathering techniques for use in attacks on American targets.

61. Mohammed testified also that he had personally handled security arrangements for a meeting in Sudan **between Osama bin Laden and Imad Mughniyah. As a result of this meeting, Iran used Hizballah to supply al Qaeda with explosives instruction, and to provide bin Laden with bombs. Much of the al Qaeda training was carried out in camps in Iran run by MOIS.**
62. On July 7, 1995, near Addis Ababa, Ethiopia, five men attempted to assassinate Egyptian President Hosni Mubarak. Israeli intelligence investigators learned that the gunmen were Egyptians who had traveled from Sudan to Ethiopia, with support and funding from Iran. Further, Israeli and Egyptian intelligence determined that al Zawahiri was behind the attempt to kill Mubarak and that he was in league with other extremists, many of whom were veterans of the Afghan war against the Soviet Union. All had found refuge in Sudan and were being supported by Iran.
63. Osama bin Laden was deeply involved in the attack on Mubarak. Mustafa Hamza, the commander of the Mubarak assassination team, was one of his men, and bin Laden dispatched him to help al Zawahiri. A number of planning meetings took place in bin Laden's own house in Sudan.

64. When Osama bin Laden and Ayman al Zawahiri were forced to leave Sudan in 1996 due to heavy American, Saudi, and Egyptian pressure on the Sudanese government, the **Iranian intelligence services assisted them in moving their operation and members to Afghanistan, Iran, Pakistan, Yemen, and Lebanon.** The organization of al Qaeda, as the world now knows it, was reconstituted with Afghanistan as bin Laden's new headquarters.

65. In the 1990's, Iran also became involved in the various conflicts in the Balkans. Here again, Tehran's interests converged with those of Osama bin Laden. After the Communist and atheistic one-party state fell in Yugoslavia in 1991, delegations from the Muslim world began to arrive in the Muslim areas of Bosnia-Herzegovina. Iran sent large sums of money to restore and rebuild mosques, in the Persian style, and to construct classrooms for religious instruction. As the ethnic cleansing campaign against Bosnian Muslims accelerated, Iran channeled money through the Iranian embassies in Sarajevo and Vienna, Austria, and arms shipments via an airfield at Visoko, northwest of Sarajevo. Meanwhile, several thousand Hizballah and Mujahedeen (the core of al Qaeda came from the ranks of the Mujahedeen) arrived to fight for the Bosnian Muslims. They were trained by the IRGC. The Islamic volunteers made a major contribution to the Bosnian Muslims' cause.

66. Even today, many mujahedeen remain in Bosnia. According to the Bosnian chief of intelligence services, "There's a group of terrorists here that is connected to extremist Islamic organizations across the world, and to Iran . . . ."

67. **In February 1998, when the veterans of Egyptian Islamic Jihad, headed by Ayman al Zawahiri, united with al Qaeda, the link between al Qaeda and Iran was strengthened.** Dr. al Zawahiri became the chief go-between for al Qaeda and Iran. According to information gathered by NSA and Mossad, al Zawahiri traveled to Iran several times after the war in Bosnia, as the guest of MOIS chief Ali Fallahian and the MOIS chief of Iranian operations abroad, Ahmad Vahidi (who was also involved in the bombing of the AMIA building in Buenos Aires in 1994).
68. **Iranian and Lebanese Hezbollah trainers traveled between Iran and Afghanistan, transferring to al Qaeda fighters such material as blueprints and drawings of bombs, manuals for wireless equipment, instruction booklets for avoiding detection by unmanned aircraft.**
69. **After al Zawahiri's arrival in Afghanistan, Iranian authorities helped him on many occasions to pass weaponry and reinforcements to al Qaeda forces across the border from Iran to Afghanistan. Ayman al Zawahiri, who has been marked as the successor to Osama bin Laden, was responsible for planning the attacks on 9/11.**
70. **The Revolutionary Guards also gave financial and logistical assistance to an al Qaeda terror cell that was active in Hamburg, Germany, according to Mossad sources monitoring an Iranian presence in the area.**
71. **Iran is also believed by the German *Bundeskriminalamt* (BND) (roughly the equivalent to the U.S. FBI) to have assisted al Qaeda's assassination of Ahmad Shah Masoud, the famous Northern Alliance commander, two days before 9/11. The**

Iranian Embassy in Brussels, Belgium, helped two Tunisian al Qaeda assassins obtain counterfeit Belgian passports and other documents which they used to enter northern Afghanistan in the guise of journalists come to interview Masoud. The Iranians also sent the two men to procure the television camera, stolen from a French journalist, which concealed the explosives used in the assassination.

72. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

73. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

74. **After 9/11, Iran harbored and sheltered many al Qaeda members who fled Afghanistan to avoid the American invasion. In particular, Iran harbored Osama bin Laden's son, Saad bin Laden, and Saif al Adel, the number three man in al Qaeda**

**and head of its “military” wing.** Additionally, **Abu Khaled al Islambuli**, the brother of the assassin of Anwar Sadat (Khalid al Islambouli), spent five years in southeastern Iran under the protection of the IRGC, as did **Mustafa Hamza**, who headed the 1995 assassination attempt on Hosni Mubarak. Some of the participants in the attempt on Mubarak's life were extricated from Ethiopia straight after it by the IRGC, and found refuge in Lebanon, where they are protected by Hezbollah under Iranian orders.

75. A May 2001 memorandum from Ali Akbar Nateq Nouri, then Iran’s Supreme Leader’s chief intelligence advisor to “Unit 43” **reveals both high-level links between the Iranian Supreme Leader’s intelligence apparatus and al Qaeda and an apparent knowledge and support of major upcoming operations.** Both Israeli and American intelligence agents who have examined the document have said that it appeared to be authentic. (An English translation of the Farsi document is attached hereto as Exhibit B.)
76. The memorandum cites “the battle against the global arrogance headed by the U.S. and Israel”, and seeks “to remove the existing lack of clarity regarding support for al Qaeda’s future plans . . . .” It states the Iranian government’s goals of damaging America’s and Israel’s “economic systems, discrediting [their] institutions . . . as part of political confrontation, and undermining [their] stability and security, . . .” and it orders Unit 43 to **“tighten[] the collaboration with other security and intelligence apparatuses in Iran and with supporters outside Iran” and to “expand[] the collaboration with the fighters of al Qaeda and Hizballah.”** The memo mandates that the intelligence apparatus of the Office of the Supreme Leader is to directly supervise all operations, and it conveys the Supreme Leader’s “full support in the implementation of its future plans.”

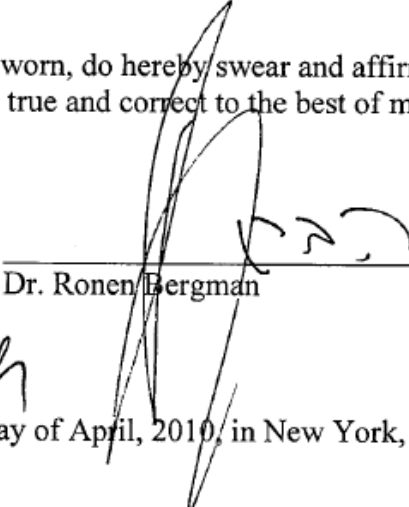
Finally, and significantly, the memorandum “emphasizes that, **with regard to co-operation with al Qaeda, no traces must be left** that might have negative and irreversible consequences, and that [the activity] must be limited to the **existing contacts with Mughniyah and al Zawahiri.**” (*Emphasis added.*)

77. While al Qaeda concentrated on America, Iran, through Hizballah, also refocused on Israel. Starting immediately after the Israeli withdrawal from Lebanon on May 24, 2000, Iran invested heavily in the buildup of Hizballah forces in southern Lebanon. Hizballah fighters underwent training at IRGC camps in Iran and in Lebanon. Iranian aid to Hizballah was coordinated by the IRGC’s al Quds force, to the tune of some \$100 million a year.
78. From 2003, Hizballah also got directly involved in the U.S.-Iraq War, training fighters of various Shi’ite groups from several countries at those IRGC camps, and then sending them to Iraq to fight the Americans.
79. The two main camps used by the al Quds Force to train the foreign fighters are the Imam Ali base in Tehran and the Bamonar base in Karaj, Iran, north of the capital. This fact was confirmed by a Hizballah fighter, Hussein Ali Sliman, captured by Israel during the 34-day war with Hizballah in 2006. Sliman told the Israelis that he had been trained in Iran with 40 to 50 other Hizballah men; their passports had not been stamped in either Syria or Iran in order to hide their trail. He also stated that two Iranians, accompanied by two Hizballah officers, visited a South Lebanon camp where he had been stationed; he recognized one of the Iranians as being one of his IRGC instructors in Iran.

80. Recent tensions, particularly surrounding the issue of Iran's apparent development of a nuclear weapons program, have caused certain revealing statements to be made by the Iranian regime. Of particular relevance to this case, the Iranians have discussed retaliation in the event of any military strike against Iran's nuclear facilities. Among the means of retaliation is the potential that al Qaeda and other terror organizations would be permitted to operate using Iranian territory freely, enabling them to strike at any state in the region, in addition to operating in Iraq and Gaza.

This Affidavit is comprised of 80 separately numbered paragraphs, and has an Exhibit A and an Exhibit B.

I, **Dr. Ronen Bergman**, being duly sworn, do hereby swear and affirm under penalty of perjury that the contents of this Affidavit are true and correct to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
Dr. Ronen Bergman

Subscribed and sworn before me this 8th day of April, 2010, in New York, New York, U.S.A.

  
\_\_\_\_\_  
Notary Public

ANDRE HATCHETT  
Notary Public, State of New York  
No. 01HA6134233  
Qualified in Westchester County  
Commission Expires Sept. 26, 2013

EXHIBIT A

TO AFFIDAVIT OF DR. RONEN BERGMAN

DETAILED EXPERT QUALIFICATIONS OF THE WITNESS

I. Military Experience

- a. Between 1990 and 1993, I served in the Israel Defense Forces ("IDF") in the intelligence unit of the Criminal Investigation Department ("CID"). This unit is responsible for gathering intelligence on a broad range of issues, both through technological means and by operating field agents. It is also responsible for coordinating CID operations with members of the Israeli intelligence community and the police.
- b. My primary responsibilities during my military service involved recruiting and running undercover agents within the IDF in order to uncover illicit sales of military equipment to terrorist organizations, drug trafficking and drug use, corruption, violence (including sexual violence), and theft. VVV As a Non-Commissioned Officer, ("NCO"), between January 1992 and November 1993, I ran the northern office of the intelligence unit — a job usually performed by an officer with the rank of captain.
- c. I continue serving as a reservist in the unit to this day. In addition, as part of my reserve duty obligations, I provide training and give lectures to various military reserve units, in particular units of Military Intelligence and the Shin Bet (the Israel Security Agency, which is responsible for domestic security).

II. Education and Clerkship

- a. I received an LLB from Haifa University in 1997, graduating *cum laude*.
- b. I clerked in the Office of the Attorney General of Israel, Mr. Elyakim Rubinstein, from 1997 to 1998. (Mr. Rubinstein was appointed Justice of the Supreme Court of Israel in 2004.)
- c. The main project I worked on while at the Office of the Attorney General was to draft legislation to combat money laundering and terrorist financing. This legislation subsequently resulted in the establishment of the Israel Money Laundering and Terror Financing Prohibition Authority. As part of my work on this project, I conducted extensive research of comparable legislation in foreign jurisdictions, and reviewed and assessed classified information on money laundering and terrorist financing that was provided by the Shin Bet and by the counter-terrorism unit at the Prime Minister's Office, which was then headed by Major General Meir Dagan (who subsequently became, and serves to this day as, Chief of the Mossad).
- d. In 2001, I received an MPhil in International Relations from Cambridge University, England. My studies were made possible through a Chevening Scholarship, a highly competitive international award program funded by the British Foreign and Commonwealth Office.
- e. I received a PhD in History from Cambridge University in 2007. My doctoral thesis, *Israel and Africa: Military and Intelligence Liaisons*, is the only broad-



scale study of the history of the military and intelligence cooperation between Israel (and the Mossad in particular) and sub-Saharan African nations. In researching my doctoral thesis, I interviewed numerous sources — for many of whom this was the first and only time they agreed to be interviewed — regarding their work for, and interaction with, Israeli intelligence services. I was also granted unprecedented access to classified documents, the majority of which have never been declassified. To the best of my knowledge, no other academic study of the Mossad has ever been awarded a PhD by a major English or U.S. university.

- f. My doctoral thesis was supervised by Christopher Andrew, Professor of Modern and Contemporary History and Chair of the History Faculty. Professor Andrew is currently the President of Corpus Christi College, Cambridge, and the Official Historian of the British Secret Service (MI5). Regarding my work, Professor Andrew has written that “Ronen Bergman combines a remarkable flair for research and tracing down elusive documents with a talent for exposition which impresses both academic and non-academic audiences.”

### III. Career in Print Journalism

- a. I began my journalism career in 1987 at the age of 16, writing for the weekly news magazine *Ha'olam Hazeq*, which at the time was the only publication of its kind in Israel.
- b. At age 18, I traveled undercover to Egypt to interview members of a cell of Islamic Jihad, an organization which was banned by the Egyptian government. In connection with the interview, I accompanied my hosts to a political protest that they had organized in one of Cairo's poorer neighborhoods, where we were caught in an ambush laid by the Egyptian security forces, who proceeded to open fire on the protestors.
- c. Between March 1995 and September 2000, I worked as a senior staff feature writer for the weekly magazine of *Ha'aretz*, one of the most respected newspapers in Israel. Most of the articles that I wrote focused on aspects of military and security affairs, and much of my research involved interviewing Israeli and foreign military and intelligence personnel of all ranks and specializations.
- d. Since September 2000, I have worked at *Yedioth Ahronoth*, where I am a senior political and military analyst. *Yedioth Ahronoth* is Israel's largest-circulation daily newspaper. Its weekend edition is read by approximately 70% of Israel's newspaper readership.
- e. In addition to the articles and features that I have published in Israeli print media outlets over the years, I have published articles in *The New York Times*, the *Wall Street Journal* and in the journal *Foreign Affairs*.
- f. I have published articles in some of the most respected European newspapers and news magazines, including *The Times* and the *Guardian* in England, the *Frankfurter Allgemeine Zeitung* and the *Sueddeutsche Zeitung* in Germany, and the *Neue Zuercher Zeitung* in Switzerland.
- g. I have been interviewed regarding my work by several newspapers, including *The Boston Globe*, *The Times*, *Der Spiegel*, and *L'Express*.

- h. My work has been referenced in some of the key U.S. and international publications that specialize in military strategy and foreign affairs, including *Foreign Policy*, *Washington Post*, *Der Spiegel* and *Defence News*.
- i. My print articles are often quoted or translated and reproduced in full (typically, without attribution) in English-, Arabic- and Farsi-language media outlets throughout the Middle East, in particular in Lebanon and Iran.

IV. Career in Television and Radio Journalism

- a. In 1999, I began appearing as an occasional host of a morning political affairs program on the Channel 1 network of Israeli TV.
- b. In 2006, I became a regular co-anchor (3-4 times a week) of *Erev Hadash*, a prestigious daytime news and current affairs magazine on Israeli TV (broadcast by the Israeli equivalent of PBS).
- c. I have appeared as a guest on several occasions on the main U.S. broadcasting networks, as well as on various radio stations in the United States.
- d. I have appeared in England on the BBC (both TV and radio).
- e. I served as consultant for a co-production of the Discovery Channel and Channel 4 of the United Kingdom of a documentary about the Israeli assassinations of Palestinian terrorists in the wake of the 1972 Munich Olympic massacre.
- f. I am a frequent guest on Al-Jazeera, having made more than 20 appearances in the past year.

V. Publications – Books

- a. In 2002, I published my first book, *Vehareshut Netunah* (Authority Granted). Based on scores of interviews and classified documents to which I was granted exclusive access, it was the first in-depth, methodical examination of the pervasive corruption within the Palestinian Authority, as well as of the Palestinian Authority's involvement in terrorism. The validity of the documentary evidence on which the book was based was challenged by the Palestinian Authority which claimed that it was fabricated, but the documentation was authenticated by non-Israeli intelligence organizations (including those of the U.S., the U.K., France, and Egypt). Over the years, the book has been widely quoted in academic studies and in the international press.
- b. My second book, *Zman Emet* (Moment of Truth), which I co-authored, was published in 2003. This book was an expansion of a series of articles, collectively entitled "120 Hours in October," which I published in August and September 2003 to mark the 30<sup>th</sup> anniversary of the Yom Kippur War. Both the articles and the book were based on recordings that were made (and to which I was granted exclusive access) of the communications that took place inside the IDF's Southern Front command bunker during the war. For purposes of the book, this material was augmented by classified documents and analyses (in the form of historical studies) that were conducted by the IDF after the war. The IDF refused to declassify these studies because of the negative light they cast on senior military personnel and the Israeli political leadership. I was able to gain access to these studies through confidential

sources. The book was published despite the opposition of the IDF. As a result of the publication of my book, however, the IDF declassified and made public the historical studies.

- c. My third book, *Nekudat Ha-al Khazor* (Point of No Return), published in May 2007, dealt with the covert war between the Israeli intelligence services and Iran. It received a very positive review in *Foreign Policy*, and has been widely quoted in the Israeli and foreign press. The book's final chapter dealt with the 2006 war in Lebanon. In it, I disclosed for the first time that the IDF had attempted to conceal from then Prime Minister Ehud Olmert reports on the condition of two Israeli soldiers kidnapped by the Hezbollah. This revelation elicited particularly strong reactions in the Israeli media and among the general public.
- d. An updated English version of *Nekudat Ha-al Khazor* was published by Simon & Schuster in 2008 under the title *The Secret War with Iran: The 30-Year Clandestine Struggle Against the World's Most Dangerous Terrorist Power*. *The Secret War with Iran* contains a wealth of materials dealing with the links that were forged, starting in the late 1980s, between Iran and various *jihadi* movements, including the Egyptian Islamic Jihad, led by Ayman al-Zawahiri, and the group surrounding Osama bin Laden. The book reveals for the first time details from Israeli intelligence files tracking the development of these links in the early 1990s in Sudan, leading ultimately to the attempt on the life of Egyptian President Mubarak in 1995 and to the formation of al-Qaeda.
- e. My most recent book in Hebrew, *Medinat Yisrael Ta'aseh Hakol* (By Any Means Necessary: Israel's Covert War for Its POWs and MIAs), which was published in September 2009, is an in-depth survey of Israeli MIA, POW, and hostage crises over the past 40 years. The culmination of 15 years of research on the topic, this book is based on approximately 400 interviews that I conducted in Israel and 20 other countries, as well as on the thousands of classified documents to which I was granted access. Among the revelations that are made public in the book for the first time are sensitive details from the files of Israeli intelligence services regarding MIA Ron Arad, an Israeli fighter pilot who was shot down in the 1986 Lebanon War and died in 1995 while being held by Iranian Intelligence. The search for Ron Arad represents the most intensive continuous effort launched by the Israeli intelligence services, and constitutes one of the central issues in the covert war between Israel and Iran.

#### VI. Publications – Principal articles

- a. In October-November 1995, I published a series of articles dealing with Jewish property that was confiscated by the Egyptian government starting in 1956 and sold to foreign governments and companies. I received the *B'nai Brith* award for journalism for my reporting. As result of the articles, I was declared *persona non grata* by the Egyptian authorities, and have since been refused entry into Egypt. These articles were referenced in plaintiffs' filings in *Bigio v. Coca Cola*, 239 F.3d 440 (2nd Cir. 2000).
- b. In November 1995, I published the first report about a factory in Spinetta Marengo, a small town in northern Italy, which manufactured agricultural

fertilizer from the bones of Holocaust victims during World War II. The article created an uproar in Italy, and in Israel it won an award from *Ha'aretz*.

- c. In December 1995, I published an article containing exclusive classified information regarding Nachum Manbar, an Israeli businessman who became the focus of interest of several intelligence organizations (including those of Israel, the U.S., the U.K., and France) for supplying Iran with dual-use chemical raw materials and technology. (Upon his return to Israel in March 1998, Nachum Manbar was arrested, tried, and convicted. He is currently serving a 16-year sentence.)
- d. In March 1997, I published a series of articles about corruption in the Palestinian Authority. The articles created an uproar in Israel when I publicly disclosed that Chairman Arafat had a personal account at a Tel Aviv branch of Bank Hapoalim (one of Israel's major banks), and that the Israeli tax authorities had, at Chairman Arafat's request, deposited approximately NIS 500 million that were owed to the Palestinian Authority pursuant to tax sharing agreements in this private account instead of in the official accounts of the Palestinian Authority. This revelation, and others in the series of articles, resulted in debates in the Knesset (the Israeli Parliament) and in the Knesset's Finance Committee on the issue of Palestinian corruption, and charges by opposition parties that the Israeli government was colluding in Palestinian corruption. The revelations also resulted in a petition being filed with the Israeli Supreme Court (sitting as the High Court of Justice) to block the appointment of Yossi Genossar, a former Shin Bet official, as special envoy to Chairman Arafat, on the grounds that he was making use of his official ties to further his personal business interests.
- e. In May 1998, I published the contents of the confidential medical file that was compiled on the night Prime Minister Yitzak Rabin was assassinated. The key items of interest in the file, whose publication caused considerable interest in Israel, were those that related to the bitter (and until then undisclosed) disagreement between a number of senior medical experts as to whether Rabin had received proper medical attention and whether his life could have been saved.
- f. In March 1999, I published an article that provided exclusive details regarding the debt of \$5 billion that Israel owed Iran from the pre-Khomeini era for contracts covering arms, oil, and oil tankers. The matter is still in arbitration today.
- g. In May 1999, I was the first journalist to interview the Palestinian-born British citizen who shot Israeli Ambassador Shlomo Argov in London in June 1982. I was the first to report the fact that the terrorist cell to which he belonged had been penetrated by British intelligence, which, as a result, had foreknowledge of the attack but failed to protect the ambassador's safety. This revelation was of particular importance, given that the attempt on Ambassador Argov's life was the *casus belli* for the Israeli invasion of Lebanon which took place three days later.
- h. In October 1999, I broke the story of Ashraf Marwan, codenamed "Agent Babylon," who was an aide to Egyptian President Sadat during the Yom Kippur War of 1973 and an Israeli spy. (Whether or not he was actually an

Egyptian double-agent is still hotly debated.) Marwan mysteriously fell to his death from a balcony in London in July 2007. A May 2009 segment of *60 Minutes* devoted to Marwan largely covered the facts that I revealed in this article. My article on Agent Babylon was translated into Arabic and published in *Al-Ahram*, the leading Egyptian daily (and government mouthpiece). This was the first time that an Israeli newspaper article was published in full in *Al-Ahram*.

- i. In April 2000, I published an exclusive interview with Dieter Gerhardt, a former senior South African naval officer and Soviet spy. In the course of his career, Gerhardt revealed to the Soviets highly-sensitive Israeli military secrets, access to which he had gained in the framework of the close military cooperation between Israel and South Africa.
- j. In May 2000, I interviewed a member of the "Caesarea unit," which is the special operations unit of the Mossad. This was not only an exclusive interview but also the first time that a member of the unit had ever talked to the media.
- k. In September 2000, I submitted for publication an article on the relations between the Ron Arad story and the Manbar affair (see ¶¶ VI.c. and V.e., respectively *supra*). The Mossad successfully petitioned an Israeli court to block publication of the article.
- l. In late 2000, I published a series of articles about the Israeli Institute of Forensic Medicine, the only entity in Israel that provides medico-legal services. My articles exposed for the first time the unreliability of the legal testimony provided by the Institute. The publication of my articles led to several committees being formed to investigate the matter. The outcome of the affair was that the Director was removed from his post, and a police inquiry was opened against him.
- m. In January 2002, I exposed a major corruption scandal in the police, in which senior police officers (including one officer who eventually became the Deputy Inspector General) incriminated suspects in serious crimes. As a result of my revelations, an individual who had been convicted of murder was exonerated by the Israeli Supreme Court and paid a large sum in compensation by the state.
- n. In March 2007, I was the first journalist to publish a report, based on British historical intelligence sources, that former Jerusalem Mayor Teddy Kollek had been a British agent during the British Mandate in Palestine, and had provided British intelligence with information on the Jewish underground, which led to the arrest and incarceration in Cyprus of many activists.
- o. In April 2009, I revealed for the first time details of illegal medical experiments that were conducted on Israeli soldiers with U.S. financing, as part of efforts to develop a new vaccine against anthrax.
- p. In July 2009 I was the first journalist to report on a groundbreaking medical development: a drug that will provide protection from the effects of nuclear radiation.

VII. Lectures

- a. I lecture frequently before Israeli audiences, including at academic institutions such as Tel Aviv University and the Interdisciplinary Center in Herzliya, and before Jewish forums around the world, including AIPAC, the Jewish Agency, and the major Jewish federations in the U.S.
- b. I have lectured at a number of universities in the United States and England, including Princeton, Yale, Columbia, NYU, Oxford, and Cambridge.
- c. I am a frequent guest lecturer at closed military and intelligence forums in Israel on topics pertaining to Israeli military history, Israel intelligence, and the relations between the intelligence community and the media.
- d. I have lectured at West Point Military Academy, both before cadets and before smaller forums with an interest in military and anti-terror issues.
- e. I have also lectured at the Royal United Services Institute (RUSI) in England, and the British Intelligence Study Group, a U.K. government-affiliated forum that focuses on intelligence issues.
- f. Over the years, I have participated in, and lectured before, various joint Israeli-Arab forums (involving both Palestinians and Arabs from Arab states), the purpose of which is to promote peaceful co-existence.
- g. I am a member of the Young Leaders Exchange Program of the *Bertelsmann Stiftung* (the German Bertelsmann Foundation) and have been invited to lecture at their forums on numerous occasions.

VIII. Intelligence gathering on unconventional warfare, cyber-terror and Iran

- a. At my instigation and under my guidance, *Yedioth Ahronoth* has become one of the first newspapers in the world to take advantage of the material offered by the two commercial spy satellites, IKONOS and DigitalGlobe. In collaboration with satellite photography analysis experts of GlobalSecurity.org, we have taken photographs and published data on nuclear, ballistic and chemical warfare installations throughout the Middle East. These publications have been widely quoted by media outlets all over the world.



EXHIBIT B  
TO AFFIDAVIT OF DR. RONEN BERGMAN  
English Translation of May 14, 2001 Memo

The Islamic Republic of Iran, the Intelligence Apparatus of the Supreme Leader – Top Secret.

Date: May 14, 2001

Reference: 4-3125-80/s/m

By: Head of the Intelligence Apparatus of the Supreme Leader

To: Head of Operations Unit No. 43 [in the Iranian Intelligence Ministry]

Re: Orders regarding the decisions of the Honorable Leader [Khamenei]

[Dear] Hujjat Al-Islam Wal-Muslimin [Mustafa] Pourkanad [director general of Operations Unit No. 43]

We wish your dedicated and courageous team every success. The results [described] in your recent reports have been examined, along with other opinions. After consideration, and in order to remove the existing lack of clarity regarding support for al-Qaeda's future plans, the Honorable Leader has emphasized that the battle against the global arrogance headed by the U.S. and Israel is an integral part of our Islamic government, and constitutes its primary goal. Damaging their economic systems, discrediting all other institutions of these two allied enemies of the Islamic government [in Iran] as part of political confrontation [with them] and undermining the stability and security [of the U.S. and Israel] are obligatory duties that must be carried out.

The Honorable [Leader Khamenei] stressed the need for each of you to be vigilant in his field of activity, and asks you to be particularly attentive. He also stressed [the need] to be alert to the [possible] negative future consequences of this cooperation [between Iran and al-Qaeda].

The Honorable [Khamenei] said that this struggle must be stepped up by tightening the collaboration with other security and intelligence apparatuses in Iran and with supporters outside Iran, thereby hindering the enemy's steadily expanding activities.

[Khamenei further instructed] that in carrying out your duties, you must operate under the direct supervision of the security division of the headquarters of the organization [i.e., the intelligence apparatus of the Supreme Leader]. Naturally, identifying [potential] damage is the responsibility of the vigilant and diligent Unit [No. 43].

It has also been decided that, in the upcoming meetings, discussions must be held in order to formulate clear goals and remove the main obstacles and difficulties in achieving these goals and in promoting the issue of expanding the collaboration with the fighters of al-Qaeda and Hizballah [Lebanon].

Finally, I wish to convey [Khamenei's] full satisfaction with Unit [No.43] and his full support in the implementation of its future plans. The Honorable [Khamenei] is aware of the important and dangerous [nature of] the tasks you perform. [He] emphasizes that, with regard to cooperation with al-Qaeda, no traces must be left that might have negative and irreversible consequences, and that [the activity] must be limited to the existing contacts with [Hizballah Operations Officer Imad] Mughniyeh and [bin Laden's deputy Ayman] al-Zawahiri.

My Allah grant you success . . .

]Seal and Signature] Ali Akbar Nateq Nouri